



THE MCBRIDE LAW FIRM, PLLC

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June 25, 2021

Via ECF

The Honorable Elizabeth A. Wolford
United States District Court, WDNY
100 State Street
Rochester, New York 14614

Re: *United States v. Titus Thompson*, 19-CR-98 (EAW)(HKS)

Your Honor:

First and foremost, we apologize for having to write this Court requesting another extension on Mr. Thompson's sentencing submissions.

In the past three weeks, we have had numerous legal-video conferences with Mr. Thompson, where each have either failed or only lasted for minutes because of technical reasons. All of the technical issues have been resolved and I have two video conferences scheduled with Mr. Thompson for tomorrow, Saturday June 26, 2021, and a follow-up on Sunday June 27, 2021.

Also, co-counsel Steven Metcalf just had his daughter born on June 23, 2021, and his wife's medical condition for the last week has rendered Mr. Metcalf unavailable this week. His family is safely back home now, and he is now able to continue to assist in these submissions.

Since he returned today, attorney Metcalf spoke to AUSA Joshua Violanti, who consented to extending submissions for two weeks. Based on this conversation, we respectfully propose that either myself or Mr. Metcalf will contact AUSA Violanti in one week from today, on or by July 2, 2021 to track the defenses progress for this upcoming week.

In light of this, it is respectfully submitted that sentencing submission be extended to July 9, 2021. We thank you in advance for your consideration and kind courtesies.

Please feel free to contact me directly at (917) 757-9537, at your earliest convenience. I thank you for your attention and your kind courtesies in this matter.

Respectfully submitted,

/s/ Joseph D. McBride, Esq.

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cc: AUSA Joshua Violanti (*via email*)
Pretrial Officer Mallori Brady (*via email*)
Steven A. Metcalf II, Esq., co-counsel (*via email*)